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April 15, 2002

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William F. Caton, Acting Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

APR 15 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Quarterly TTY Implementation Report*  
*CC Docket No. 94-102*  
*Broadband PCS Station WPOI210*  
*MTA042: Powell, Kalispell and Missoula, Montana*

Dear Mr. Caton:

On behalf of Montana Wireless, Inc., and pursuant to the directive contained in the Commission's *Fourth Report and Order* in CC Docket No. 94-102, FCC 00-436 (*rel.* December 14, 2000), we are submitting herewith its quarterly report addressing the requirements for digital wireless systems to provide TTY access to E-911 emergency calling systems.

Please refer any questions or correspondence to this office.

Very truly yours,



John A. Prendergast  
Kathleen A. Kaercher  
Attorneys for Montana Wireless, Inc.

Attachment

cc (w/att.): Kris Monteith  
Pam Gregory  
Mindy Littell  
Qualex International

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**Montana Wireless, Inc.  
1221 North Russell Street  
Missoula, Montana 59808-1805**

April 15, 2002

Mr. William F. Caton, Acting Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

***Re: Quarterly TTY Implementation Report  
CC Docket No. 94-102  
Broadband PCS Stations WPOI210  
MTA042: Powell, Kalispell and Missoula, Montana***

Dear Mr. Caton:

Montana Wireless, Inc. ("MWI") hereby submits its quarterly report on implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.<sup>1</sup>

MWI is using Nortel CDMA base stations and switching equipment in its network. Thus, MWI is dependent on Nortel for the provision and installation of the equipment and software necessary to allow MWI's digital wireless network to process 911 calls originating from TTY devices. Nortel's sales representative informed MWI that its current Nortel DMS-100 Dual Load, Wireless on Wireline switch would not be upgraded or supported further and that MWI would be required to change from the current switch configuration to a new switch. Apparently, Nortel had made a business decision, based on the market demand for the DMS-100 Dual Load Wireless on Wireline product, that LWW007 (the equivalent to wireless MTX 9) would be the last DMS-100 Dual Load Wireless on Wireline software load.

MWI must transition its infrastructure to separate wireline/wireless switching platforms, and load one of them to the wireless load MTX10, which is the software that will provide the TTY function to MWI's system. MWI must upgrade its switch, split its switch and load additional software. MWI has requested a quote from Nortel on a weekly basis since late 2001, but Nortel has not yet agreed to a schedule to provide the required equipment and software to upgrade MWI's system.

MWI is a small carrier serving a rural area, and lacks any influence over the research and development activities of its equipment vendors. We understand that Nortel will be providing information about TTY compatibility of their CDMA equipment in their quarterly update filing through the TTY Forum.

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<sup>1</sup> See Attachment.

MWI remains committed to meeting the June 30, 2002 TTY implementation deadline, but is concerned that the deadline might not be achievable. MWI is trying to determine whether it will need to submit a request a waiver of the TTY implementation deadline.

Respectfully submitted,

**Montana Wireless, Inc.**

By: 

Bill Squires

Senior Vice President – General Counsel

**Montana Wireless, Inc.**  
**E911 TTY Device Capability Report as of March 31, 2002**

**Development Activities**

1. **Network Infrastructure Software Development** – We continue to be in discussions with our network vendor, Nortel. They have indicated that TTY compatible software will be in the MTX 10.0 software load. This software load cannot be installed until the current switch is split and a new switch installed.
2. **Handset Development and Testing Plans** – Our handset vendors continue to work on the development of a TTY capable handset. Nokia has informed us that it has developed a handset, model 6370, that should become available mid-May 2002. Nokia has another model, 6385, that will become available July 2002 and a third, model 3585, that would be available late September 2002. Motorola in about 90 days will begin manufacturing phones that have a software upgrade to make them TTY compatible. We will evaluate these phones when they become available.
3. **Beta Testing and Lab Testing** – MWI is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, MWI will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer's specifications.
4. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
6. **Efforts Toward Achieving Digital Wireless Solution Compatibility with enhanced TTY** – MWI must upgrade its switch, split its switch and load additional software. MWI has requested a quote from Nortel on a weekly basis since late 2001, but Nortel has not yet agreed to a schedule to provide the required equipment and software to upgrade MWI's system.

**Testing and Deployment Activities**

7. **Carrier Coordination of Testing with PSAP** – MWI will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.

- 8. Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
- 9. Retail Availability of Necessary Consumer Equipment** – MWI is unable to determine the retail availability of consumer equipment, as none of the handset manufacturers has been able to release a date for general availability. However, as indicated above, at least two major manufacturers have indicated that they are moving toward handset availability by mid-2002.
- 10. Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.